

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JANE DOE

Plaintiff,

v.

CENK SIDAR

Defendant.

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Civil Action No. 1:22-cv-00545 (CMH/TCB)

---

**DECLARATION**

The undersigned, Cenk Sidar, pursuant to 28 U.S. Code § 1746, submits the following declaration in connection with Defendant’s Reply to Plaintiff’s Opposition to Defendant’s Motion to Remove Pseudonym Designation.

1. I am over the age of 18 and competent to testify.
2. I have personal knowledge of the facts relevant to this matter.
3. Prior to Plaintiff’s counsel, Thomas Urban, filing the Fairfax Circuit Court case in this matter, Plaintiff’s counsel contacted me.
4. I did not have counsel at the time.
5. He attempted to both settle claims Plaintiff made against me and obtain my consent to providing a DNA sample.
6. Mr. Urban said to me: “You are a businessman, you are married, and have kids, and don’t want this to be a major issue for you, so why don’t you just do what we ask you to do and provide DNA?”

7. The statement in Plaintiff's Opposition that "[p]rior to her filing, she undertook extensive discussions with Defendant's counsel in efforts to avoid litigation" is false, as I was not represented by counsel at the time.

8. Plaintiff's allegations subject me to reputational harm, including in relation to my profession.

9. For example, Walter Steimel, Plaintiff's other attorney in this matter, sent the correspondence, attached to this declaration as **Exhibit A**, to the Chief Administrative Officer of my employer, Enquire AI, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 15, 2022.

  
\_\_\_\_\_  
Cenk Sidar